

**Commonwealth of Massachusetts  
Department of Telecommunications and Energy  
Fitchburg Gas and Electric Light Company  
Docket No. D.T.E. 02-24/25  
Responses to the Attorney General's Third Set of Information Requests**

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**Request No. DTE-3-4 (Electric)**

In JLH-3, have you included only distribution investment designed to increase capacity or is all distribution plant investment, i.e. including reliability-related investment, reflected?

**Response:**

In Schedule JLH-3 Electric page 4 (Table 2, page 2), only the portion of the distribution plant investment related to load growth is used to calculate the marginal cost. As described in note 3 and line 25, the percent related to load growth is applied to all distribution plant additions adjusted by the Handy-Whitman index. Specific reliability-related investments are not included.

**Person Responsible:** James L. Harrison